

CAUSE NO. D190381-C

TEXAS FARMERS INSURANCE
COMPANY as Subrogee of GLEN and
THELMA STERLING

v.

BSH HOME APPLIANCES
CORPORATION

§ IN THE DISTRICT COURT OF
§ ORANGE COUNTY, TEXAS
§
§ 260TH JUDICIAL DISTRICT

**ORIGINAL ANSWER OF DEFENDANT
BSH HOME APPLIANCES CORPORATION**

Defendant BSH Home Appliances Corporation (“Defendant”) files this Original Answer and would show the Court the following:

GENERAL DENIAL

As authorized by Rule 92 of the Texas Rules of Civil Procedure, Defendant enters a general denial of all matters pled by Plaintiff Texas Farmers Insurance Company as subrogee of Glen and Thelma Sterling (“Plaintiff”) and requests that the Court require Plaintiff to prove its charges and allegations by a preponderance of the evidence or clear and convincing evidence as required by the Constitution and laws of the State of Texas.

WHEREFORE, PREMISES CONSIDERED, Defendant BSH Home Appliances Corporation requests that Plaintiff Texas Farmers Insurance Company as subrogee of Glen and Thelma Sterling take nothing against BSH Home Appliances Corporation and that Defendant BSH Home Appliances Corporation have and recover its attorneys’ fees and costs of court. Finally, Defendant BSH Home Appliances Corporation requests all other relief, legal or equitable, general or special, to which Defendant BSH Home Appliances Corporation may show itself justly entitled.



EXHIBIT

C

Respectfully submitted,

SHEEHY WARE & PAPPAS, P.C.

By: /s/ Raymond A. Neuer

Raymond A. Neuer
SBN 14928350
rneuer@sheehyware.com
2500 Two Houston Center
909 Fannin Street
Houston, Texas 77010
713.951.1000 – telephone
713.951.1199 – facsimile

*Attorneys for Defendant
BSH Home Appliances Corporation*

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document has been forwarded to all known counsel of record in accordance with the Texas Rules of Civil Procedure on October 11, 2019.

/s/ Raymond A. Neuer

Raymond A. Neuer